

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

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|---------------------------------------|---|---------------------|
| |) | MM Docket No. 99-25 |
| |) | |
| |) | |
| Creation of a Low Power Radio Service |) | RM-9208 |
| |) | RM-9242 |
| |) | |
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Reply Comments

San Bernardino Community College District (the ADistrict≡ or AKVCR≡), licensee of Non-Commercial Educational FM Broadcast Station KVCR, 91.9 MHz, San Bernardino, California, submits the following reply comments in this rule making.

The District is particularly concerned with the relaxation of current interference standards proposed by the Commission to permit institution of low power FM service. The KVCR service area has been deluged by noncommercial FM translator applications which have either created interference or the potential for interference to the operation of KVCR. In recent years, listener complaints have increased because of the proliferation of new FM translator operations.

The current rule making proposal would increase the likelihood that the service rendered by stations like KVCR will be impaired by new low power stations to the detriment of listeners. Although the idea of establishing more radio stations appears attractive, there is no assurance that the collective impact of additional use of the frequency spectrum will not adversely affect both existing

and new stations. This rule making proposal, though laudable, has more of the features of a wish than a reality.

Additionally, the impact of this proposal on in-band, on channel digital radio (IBOC) is unclear, given the unresolved questions of the elimination or modification of current interference standards. It seems clearly premature to institute a new radio service without knowing the effects of such service on IBOC digital radio. Technology is advancing so swiftly that the need for a low power FM service may become unnecessary before it is even in a position to begin.

The District is also concerned that the adoption of this uncertain proposal will reduce the performance and quality of existing FM service and potential low power facilities to the detriment of radio service to the public and hinder the survival of any low FM power radio service. Although this proposal may seem exciting on paper, in practice its potential appears to carry great risk for all concerned.

Respectfully submitted,

San Bernardino Community College District

By: /s/ Lew Warren
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